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and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF PLAINTIFFS' MOTION
FOR RELIEF FROM NON-DISPOSITIVE
PRETRIAL ORDER OF MAGISTRATE
JUDGE**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 6-3 in support of Plaintiffs’ Motion for Relief From Non-Dispositive Pretrial Order of Magistrate Judge.

2. Attached to this Declaration as **Exhibit A** is a document Bates stamped Meta_Kadrey_00218170.

3. Attached to this Declaration as **Exhibit B** is a document Bates stamped Meta_Kadrey_00211699.

4. Attached to this Declaration as **Exhibit C** is a document Bates stamped Meta_Kadrey_00209134.

5. Attached to this Declaration as **Exhibit D** is a document Bates stamped Meta_Kadrey_00089791.

6. Attached to this Declaration as **Exhibit E** are selected transcript excerpts from the November 20, 2024 Rule 30(b)(6) deposition of Michael Clark.

7. Attached to this Declaration as **Exhibit F** is a document Bates stamped Meta_Kadrey_00108336.

8. Attached to this Declaration as **Exhibit G** is a document Bates stamped Meta_Kadrey_00204223.

9. Attached to this Declaration as **Exhibit H** is a document Bates stamped Meta_Kadrey_00107954.

10. Attached to this Declaration as **Exhibit I** are selected transcript excerpts from the December 5, 2024 Rule 30(b)(1) deposition of Nikolay Bashlykov.

11. Attached to this Declaration as **Exhibit J** are selected entries from Meta's privilege logs.

12. Attached to this Declaration as **Exhibit K** are selected transcript excerpts from the November 14, 2024 deposition of Amanda Kallet.

13. Attached to this Declaration as **Exhibit L** are selected transcript excerpts from the September 26, 2024 deposition of Eleonora Presani.

14. Attached to this Declaration as **Exhibit M** are selected transcript excerpts from the December 5, 2024 deposition of Sy Choudhury.

15. Attached to this Declaration as **Exhibit N** are selected transcript excerpts from the December 11, 2024 deposition of Sean Bell.

16. Attached to this Declaration as **Exhibit O** are selected transcript excerpts from the October 31, 2024 deposition of Chaya Nayak.

17. Attached to this Declaration as **Exhibit P** are selected transcript excerpts from the November 18, 2024 deposition of Alex Boesenberg.

18. Attached to this Declaration as **Exhibit Q** are selected transcript excerpts from the September 17, 2024 deposition of Melanie Kambadur.

19. Attached to this Declaration as **Exhibit R** are selected transcript excerpts from the November 6, 2024 deposition of Joelle Pineau.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of January 2025 in San Francisco, California.

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt